

United States District Court
Southern District of Ohio

United States of America,

Plaintiff-Respondent,

v.

Marco Merino,

Defendant-Movant.

Case No. 2:22-cr-00014-EAS-1

Motion for Presentence Investigation Report

Marco Merino (“Merino”), by and through the undersigned counsel, respectfully moves for release of the Presentence Investigation report (“PSR”) in this matter to Merino’s counsel, Mr. Hal Arenstein and Mr. Jeremy Gordon. In support thereof, the undersigned offers the following:

1. On January 31, 2024, Attorney Arenstein entered his appearance on behalf of Merino. Docket Entry (“DE”) 53. On January 31, 2024, the court granted Attorney Gordon’s motion for admittance *pro hac vice*. DE 56.
2. The undersigned will be representing Merino in post-conviction proceedings related to a motion under 28 U.S.C. § 2255.
3. The undersigned requires access to Mr. Merino’s PSR to fully review the case in anticipation of further filings in this matter.
4. The undersigned agrees not to make any unauthorized disclosure of the PSR to any third party.

5. The undersigned has conferred with Peter Glenn-Applegate, counsel for the government on this matter. On February 8, 2024, Mr. Glenn-Applegate indicated that the government did not oppose this motion.

Wherefore, the undersigned requests the Court to direct the release of Merino's PSR to Mr. Jeremy Gordon via email at jeremy@gordondefense.com.

Respectfully submitted,

/s/ Hal R. Arenstein
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Local Counsel for Defendant

/s/ Jeremy Gordon

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Counsel pro hac vice for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was duly filed and served upon counsel of record, via the Court's CM/ECF system, this 9th day of February 2024.

/s/ Hal R. Arenstein